JUDGE:	Hon. Marc L. Barreca
CHAPTER:	Chapter 7
HEARING DATE:	September 7, 2012
HEARING TIME:	9:30 a.m.
HEARING SITE:	700 Stewart St., #7106 Seattle, WA 98101
RESPONSE DATE:	August 31, 2012

UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re: ADAM GROSSMAN, Debtor.	Case No. 10-19817 NOTICE OF HEARING AND OBJECTION TO PROOF OF CLAIM #21 FILED BY ADAM GROSSMAN ON BEHALF OF ROBERT DELLES FAMILY TRUST

TO: CLERK OF COURT
TO: OFFICE OF THE U.S. TRUSTEE
TO: DEBTOR'S ATTORNEY
TO: DEBTOR AND
TO: CREDITOR/CLAIMANT

Robert Delles Family Trust
1911 Sacramento Street
San Francisco, CA 94109

Ronald Brown, the chapter 7 Trustee has filed papers with the Court objecting to the claim you filed in this case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one, in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief requested in the Trustee's Objection, or if you want the Court to consider your view on the Objection, then on or before Friday, August 31, 2012 you or your attorney must do the following:

File with the Court a written response to the Trustee's Objection to your claim, explaining your position. The response must be filed at the United States Bankruptcy Court for the Western

Wood & Jones, P.S.
303 N. 67th Street
Seattle WA 98103
(206) 623-4382

District of Washington at Seattle, 700 Stewart Street, #6301, Seattle, Washington, 98101, and a copy served on Denice Moewes, 303 N. 67th Street, Seattle, Washington, 98103.

If you mail your response you must mail it early enough so that the Court, the Judge and the undersigned will receive it on or before the date stated above.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Trustee's Objection and may enter and order granting that relief.

OBJECTION TO CLAIM

YOU ARE HEREBY NOTIFIED that Ronald Brown, the Trustee herein objects to the claim which Adam Grossman filed on behalf of Robert Delles Family Trust under claim number 21. A hearing on the Trustee's Objection is scheduled for Friday, September 7, 2012, at 9:30 a.m., at U.S. Federal Courthouse, 700 Stewart Street, #7106, Seattle, Washington, 98101.

The Trustee objects to your claim upon the grounds indicated below:

The Debtor, Adam Grossman filed proof of claim #21 on behalf of the Robert Delles Family Trust in the amount of $159,309.10. The $159,309.10 is apparently the money that the Robert Delles Family Trust invested in Ptarmigan.

The claim of the Robert Delles Family Trust is a claim against either the Tanager Fund or Terrington Davies, LLC. The documentation attached to the proof of claim shows that on January 18, 2011 $159,309.10 was wired out of the Terrington Davies Account. Attached to the Declaration of Denice Moewes filed simultaneously herewith is a copy of the bank statement for the Ptarmigan Real Estate Fund for January, 2011 showing a wire in in the amount of $159,309.10. The sole signatory on the Ptarmigan real estate fund is Adam Grossman. Moewes Declaration, Exhibit "2" and "3 ".

The Robert Delles Family Trust contends that the $159,309.10 that was transferred into the Ptarmigan Real Estate Fund controlled by Mr. Grossman was stolen from them by Mr. Grossman. Moewes Declaration, Exhibit "4".

The funds in question were transferred in January, 2011, almost five (5) months after the date the debtor filed this bankruptcy proceeding. Thus, any claim against Mr. Grossman constitutes a post-petition claim and is not an obligation of this estate.

The claim should be denied in its entirety.

Dated this 30th day of July, 2012.

Wood & Jones, P.S.
303 N. 67th Street
Seattle WA 98103
(206) 623-4382

WOOD & JONES, P.S.

/s/ Denice E. Moewes
Denice E. Moewes, WSBA#19464
Attorney for Trustee
Ronald G. Brown

I hereby certify that on this 30th day of July, 2012 I sent via first class mail, postage prepaid, a copy of this Objection to Claim and Notice of Hearing to the claimant at the address listed above and to the debtor at the address listed on the mailing matrix of 5766 – 27th Avenue NE, Seattle, WA 98105. The debtor's counsel and the Office of the U.S. Trustee was served via ECF.

/s/ Denice Moewes
Denice E. Moewes

Wood & Jones, P.S.
303 N. 67th Street
Seattle WA 98103
(206) 623-4382